

MELVIN R. GOLDMAN (CA SB NO. 34097)  
 MGoldman@mofo.com  
 STEPHEN P. FRECCERO (CA SB NO. 131093)  
 SFreccero@mofo.com  
 DEREK F. FORAN (CA SB NO. 224569)  
 DForan@mofo.com  
 MORRISON & FOERSTER LLP  
 425 Market Street  
 San Francisco, California 94105-2482  
 Telephone: 415.268.7000  
 Facsimile: 415.268.7522

DAVID L. MEYER  
 MORRISON & FOERSTER LLP  
 2000 Pennsylvania Avenue, NW  
 Suite 6000  
 Washington, DC 20006-1888  
 Telephone: 202.887.1500  
 Facsimile: 202.887.0763

*Counsel for Defendant  
 Epson Imaging Devices Corporation*

[Additional counsel and parties listed on signature  
 page]

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)  
 ANTITRUST LITIGATION

Master File No. M:07-1827 SI  
 MDL No. 1827

This Document Relates to:  
 Individual Case No. 3:10-cv-03205-SI

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING SERVICE  
 AND SCHEDULING**

TracFone Wireless, Inc.

Plaintiff,

v.

Individual Case No. 3:10-cv-03205-SI

**STIPULATION AND [PROPOSED]  
 ORDER REGARDING SERVICE  
 AND SCHEDULING**

AU Optronics Corporation; AU Optronics  
 Corporation America, Inc.; Chi Mei Corporation;  
 Chi Mei Optoelectronics Corporation; Chi Mei  
 Optoelectronics USA, Inc.; CMO Japan Co. Ltd.;  
 Nexgen Mediatech, Inc.; Nexgen Mediatech USA,  
 Inc.; Epson Imaging Devices Corporation;  
 Chunghwa Picture Tubes Ltd.; Tatung Company  
 of America, Inc.; HannStar Display Corporation;  
 LG Display Co. Ltd.; LG Display America Inc.;  
 Sharp Corporation; Sharp Electronics  
 Corporation; Toshiba Corporation; Toshiba  
 America Electronics Components, Inc.; Toshiba  
 Mobile Display Co., Ltd.; Toshiba America  
 Information Systems, Inc.,

Defendants.

1 WHEREAS plaintiff TracFone Wireless, Inc. (“TracFone”) filed the above captioned  
2 lawsuit on May 4, 2010 in United States District Court, Southern District of Florida;

3 WHEREAS TracFone filed a Notice of Tag-Along Action to In re TFT-LCD (Flat  
4 Panel) Antitrust Litigation, Case No. M:07-CV-1827-SI, MDL No. 1827, on May 20, 2010;

5 WHEREAS on June 22, 2010, the case was transferred to the Northern District of  
6 California, and assigned to the Honorable Susan Illston;

7 WHEREAS, the undersigned Defendants have agreed to waive service and the parties  
8 have reached an agreement, pursuant to Civil L.R. 6-1(a), to extend the time within which the  
9 Defendants must move against, answer or otherwise respond to TracFone’s Complaint;

10 WHEREAS, this extension will not alter the date of any event or any deadline already  
11 fixed by the Court;

12 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and among  
13 the undersigned counsel, on behalf of their respective clients, TracFone, on the one hand, and  
14 defendants Chi Mei Corporation; Chi Mei Optoelectronics Corporation; Chi Mei  
15 Optoelectronics USA, Inc.; CMO Japan Co. Ltd.; Nexgen Mediatech, Inc.; Nexgen Mediatech  
16 USA, Inc.; Epson Imaging Devices Corporation; Tatung Company of America, Inc.; HannStar  
17 Display Corporation; LG Display Co. Ltd.; LG Display America Inc.; Sharp Corporation; Sharp  
18 Electronics Corporation; Toshiba Corporation; Toshiba America Electronics Components, Inc.;  
19 Toshiba Mobile Display Co., Ltd.; and Toshiba America Information Systems (collectively,  
20 “Defendants”) on the other hand, as follows:

21 1. Defendants waive service of TracFone’s Complaint under Federal Rule of Civil  
22 Procedure 4(d).

23 2. Defendants will have until September 17, 2010, to move against, answer or  
24 otherwise respond to TracFone’s Complaint.

25 3. In the event that TracFone amends its Original Complaint prior to September 17,  
26 2010, TracFone will provide Defendants with reasonable notice of its intent to do so by no later  
27 than September 3, 2010, and Defendants will have until either 45 days from the date of  
28

amendment, or September 17, 2010, whichever is later, to move against, answer or otherwise respond to the Amended Complaint.

4. Entering into this stipulation does not effect a waiver of any defense under Federal Rule of Civil Procedure 12. This stipulation does not constitute a waiver of any challenge to personal jurisdiction by any Defendant.

5. Defendants do not object to counsel for TracFone participating in depositions prior to the time that Defendants respond to the Complaint or Amended Complaint.

IT IS SO STIPULATED:

Dated: July 26, 2010

By: /s/ David B. Esau  
James B. Baldinger  
Robert L. Ciotti  
David B. Esau  
Carlton Fields, P.A.  
525 Okeechobee Boulevard  
West Palm Beach, Florida 33401  
(561) 659-7070  
(561) 659-7368 (Fax)  
*Counsel for TracFone Wireless, Inc.*

By: /s/ Stephen P. Freccero  
Melvin Goldman (CA SB NO. 34097)  
Stephen P. Freccero (CA SB NO. 131093)  
Derek F. Foran (CA SB NO. 224569)  
mgoldman@mofo.com  
sfreccero@mofo.com  
dforan@mofo.com  
Morrison & Foerster LLP  
425 Market Street  
San Francisco, California 94105-2482  
(415) 268-7000  
(415) 268-7522 (Fax)  
*Counsel for Defendants Epson Imaging Device Corporation*

1 By: /s/ Steven F. Cherry  
2 Steven F. Cherry  
3 Gordon Pearson  
4 steven.cherry@wilmerhale.com  
5 gordon.pearson@wilmerhale.com  
6 Wilmer Cutler Pickering  
7 Hale and Dorr LLP  
8 1875 Pennsylvania Avenue, N.W.  
9 Washington, DC 20006-3642  
10 *Counsel for Defendants*  
11 *Chi Mei Corporation, Chi Mei*  
12 *Optoelectronics Corporation, CMO Japan*  
13 *Co., Ltd., Chi Mei Optoelectronics USA*  
14 *Inc., Nexgen Mediatech Inc., Nexgen*  
15 *Mediatech USA Inc.*

16 By: /s/ Bruce H. Jackson  
17 Bruce H. Jackson  
18 Bruce.h.jackson@bakernet.com  
19 Baker & McKenzie LLP  
20 Two Embarcadero Center, 11th Floor  
21 San Francisco, CA 94111  
22 *Counsel for Defendant*  
23 *Tatung Company of America, Inc.*

24 By: /s/ Hugh F. Bangasser  
25 Hugh F. Bangasser  
26 Ramona Emerson  
27 hugh.bangasser@klgates.com  
28 ramona.emerson@klgates.com  
K& L Gates LLP  
925 Fourth Avenue, Suite 2900  
Seattle, WA 98104-1158  
*Counsel for Defendant*  
*Hannstar Display Corporation*

29 By: /s/ Michael R. Lazerwitz  
30 Michael R. Lazerwitz  
31 mlazerwitz@cgsh.com  
32 Cleary Gottlieb Steen & Hamilton LLP  
33 2000 Pennsylvania Avenue, N.W.  
34 Washington, D.C. 20006  
35 *Counsel for Defendants*  
36 *LG Display Co., Ltd and LG Display*  
37 *America, Inc.*

1 By: /s/ Jacob R. Sorensen  
2 Jacob R. Sorensen  
3 jake.sorensen@pillsburylaw.com  
4 Pillsbury Winthrop Shaw Pittman LLP  
5 50 Fremont Street, 5th Floor  
6 San Francisco, CA 94105  
7 *Counsel for Defendants*  
8 *Sharp Corporation and Sharp Electronics*  
9 *Corporation*

7 By: /s/ Wayne A. Cross  
8 Wayne A. Cross  
9 Kristen McAhren  
10 John H. Chung  
11 wcross@whitecase.com  
12 kmcahren@whitecase.com  
13 jchung@whitecase.com  
14 WHITE & CASE LLP  
15 1155 Avenue of the Americas  
16 New York, NY 10036  
17 *Counsel for Defendants*  
18 *Toshiba Corporation, Toshiba Matsushita*  
19 *Display Co., Ltd., Toshiba America*  
20 *Electronic Components, Inc., Toshiba*  
21 *America Information Systems, Inc.*

16 Attestation: The filer of this document attests that the concurrence of the other  
17 signatories thereto has been obtained.

18 **IT IS SO ORDERED.**

19 

20 Hon. Susan Illston  
21 United States District Judge